Bradley T. Hunsicker (WY Bar No. 7-4579)
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Attorneys for Debtor

## IN THE UNITED STATES BANKRUPTCY COURT FOR THE DISTRICT OF WYOMING

In re:	)	
	)	
POWELL VALLEY HEAL	TH )	
CARE, INC.,	)	
	)	Case No. 16-20326
	)	CHAPTER 11
Debtor	. )	
	)	
	· · · · · · · · · · · · · · · · · · ·	

## NOTICE OF PROPOSED PERSONAL INJURY TRUSTEE IN ACCORDANCE WITH SECTION 1.5 OF THE DEBTOR'S AMENDED CHAPTER 11 PLAN OF REORGANIZATION DATED SEPTEBMER 26, 2017 [DOC. 656]

The above-named Debtor-in-Possession (the "Debtor"), by and through its counsel, hereby files its notice of proposed Personal Injury Trustee in accordance with Section 1.5 of the Debtor's *Amended Chapter 11 Plan of Reorganization Dated September 26*, 2017 [Doc. 656], and states as follows:

1. The contact information for the proposed Personal Injury Trustee is as follows:

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Scott Goldstein, Attorney Spencer Fane 1000 Walnut, Suite 1400 Kansas City, MO 64106 Telephone: (816) 292 8218 Facsimile: (816) 474 3216

{Z0195047/1 }

Email: sgoldstein@spencerfane.com

- 2. A resume setting forth the qualifications of Mr. Goldstein is attached hereto at Exhibit A.
- 3. Mr. Goldstein's connections between the holders of Trust Personal Injury Claims and Covered Personal Injury Claims (*i.e.*, Tort Claimants), counsel to the Tort Claimants, the Debtor, the members of the proposed Personal Injury Claims Committee, the Creditors Committee, its members, and its counsel, and any insiders of any of the foregoing as defined in section 101(31) of the Bankruptcy Code, include the following:
  - a. Mr. Goldstein, and his firm, Spencer Fane, represented the Official

    Committee of Unsecured Creditors (the "Committee") in the

    Debtor's bankruptcy case; and,
  - b. Mr. Goldstein has asserted that neither he, nor his firm (Spencer Fane), nor any partner, attorney of counsel, or associate of his firm, has any other connection with the above-referenced parties other than their involvement as counsel for the Committee (see Declaration of Scott J. Goldstein in Support of Application for Order Authorizing Employment of Spencer Fane LLP as Attorneys for the Committee and Disclosure Statement Pursuant to 11 U.S.C. §§ 328(a), 329 and 504 and Bankruptcy Rules 2014(a) and 2016(b), Nunc Pro Tunc to June 21, 2016 [Doc. 217-1] (attached hereto at Exhibit B).

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**DATED** this 22<sup>nd</sup> day of November, 2017.

## MARKUS WILLIAMS YOUNG AND ZIMMERMANN LLC

By: <u>/s/ Bradley T. Hunsicker</u>
Bradley T. Hunsicker (WY Bar No 7-4579)
106 East Lincolnway Suite 300

Cheyenne, WY 82001 Telephone: 307-778-8178 Facsimile: 307-638-1975

Email: bhunsicker@markuswilliams.com

Counsel for the Debtor and Debtor-in-Possession

## **CERTIFICATE OF SERVICE**

The undersigned certifies that on November 22, 2017, a copy of the foregoing was served *electronically* upon **The Office of the United States Trustee** and those parties requesting notice and registered on the Court's CM/ECF system.

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s/Bradley T. Hunsicker

Bradley T. Hunsicker